

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Terrance BANKS

Case: 2:22-mj-30036

Assigned To : Unassigned

Assign. Date : 1/24/2022

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 15, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

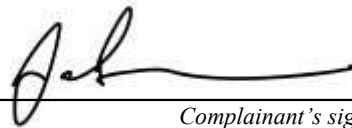
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

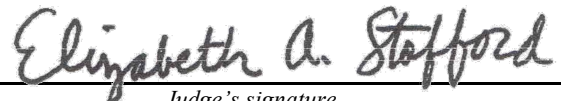
Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 24, 2022

City and state: Detroit, Michigan

*Complainant's signature*

Task Force Officer Jaclyn Kocis-Maniaci - ATF

Printed name and title*Judge's signature*

Honorable Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Task Force Officer Jaclyn Kocis-Maniaci, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017. During my career, I have been involved in numerous investigations involving firearms and narcotics laws resulting in successful federal and state prosecutions.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause that Terrance BANKS (DOB xx/xx/1990) has violated Title 18, United States Code, Section 922(g)(1), Felon in Possession of a

Firearm, and does not contain all details or facts known to law enforcement related to this investigation.

II. PROBABLE CAUSE

4. On December 15, 2021 Detroit Police Department (DPD) officers were traveling in the area of Evergreen and Wadsworth in the City of Detroit, when they observed a blue Ford Crown Victoria with dark tinted windows and an unreadable Ohio temporary license plate. Officers conducted a traffic stop for violations related to the tinted windows and the unreadable license plate.

5. DPD officers approached the vehicle and advised the sole occupant and driver, Terrance BANKS, the reason for the traffic stop and asked if he had a license. BANKS was unable to produce a valid driver's license or a concealed license permit. While BANKS was being removed from the vehicle, BANKS told the officers that he did have a weapon and it was for his protection.

6. During the search of the vehicle, officers recovered a Paramount .32 auto caliber handgun from inside the vehicle.

7. On December 19, 2021, a computerized criminal history check showed that has the following felony convictions:

- a. 2008- breaking and entering a building with intent Michigan;
- b. 2008- home invasion, 2nd degree, Michigan,
- c. 2008- assault with intent to rob while armed, Michigan;
- d. 2015- police officer fleeing-fourth degree, Michigan;

8. January 6, 2022, Special Agent Joshua McClure advised Affiant, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the state of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

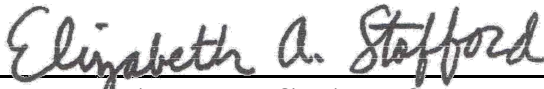
III. CONCLUSION

9. Probable cause exists that Terrance BANKS, a convicted felon, did knowingly possess a firearm and ammunition, that had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1).



Jaclyn Kocis-Maniaci, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. ELIZABETH STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: January 24, 2022